

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 1,544,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference, including approximately 483,000 documents since Defendants' last update on November 22, 2024.
- Defendants have produced over 251,000 documents and over 12 billion observations of data covering 7 different countries in this litigation to date, including over 241,100 documents since Defendants' last update on November 22, 2024.
- Defendants expect to produce over 60,000 additional documents by next week.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: December 6, 2024

Respectfully submitted,

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